

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2018 JAN -3 AM 11:06

UNITED STATES OF AMERICA

v.

JACKSON EWING WRIGHT

NO.

3-18CR-001-K

DEPUTY CLERK *AK*

FACTUAL RESUME

In support of Wright's plea of guilty to the offense in Count One of the Information, Wright, the defendant, James Whalen, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the Information, charging a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), that is, Possession with Intent to Distribute a Controlled Substance, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly possessed a controlled substance;
- Second.* That the substance was in fact a mixture or substance containing a detectable amount of Alprazolam; and
- Third.* That the defendant possessed the substance with the intent to distribute it.

STIPULATED FACTS

1. Between in or about May 2017, and in or about December 2017, in the Dallas Division of the Northern District of Texas and elsewhere, Jackson Ewing Wright,

¹ Pattern Crim. Jury Instr. 5th Cir. 2.93 (2015).

knowingly and intentionally combined, conspired, confederated and agreed with other persons, to possess with intent to distribute Alprazolam, a Schedule IV controlled substance.

2. More specifically, on or about May 9, 2017, Wright was arrested by the Plano Police Department, Plano, Texas during a traffic stop, when he was found to be in the possession of several Alprazolam (Xanax) pills and Marijuana. Wright admitted that the Alprazolam was being shipped to the U.S. from Canada “by the millions.” Wright admitted that the Xanax costs him “under a couple of dollars.” And that he was redistributing Alprazolam to other for profit.

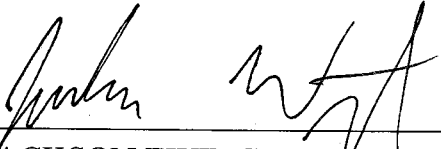
3. For example, in June 2017, Wright mailed 14 packages, each containing approximately 1,000 Alprazolam pills to other individuals. Wright is not a medical doctor and is not authorized to dispense Alprazolam.

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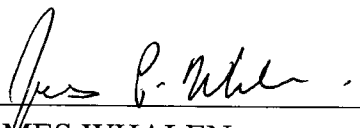
4. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the Information.

AGREED TO AND STIPULATED on this 3rd day of January, 2018.


ERIN NEALY COX
UNITED STATES ATTORNEY



JACKSON EWING WRIGHT
Defendant



JAMES WHALEN
Attorney for Defendant



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